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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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In the Matter of:	)	
	)	
Implementation of 911 Act	)	WT Docket No. <u>00-110</u>
The Use of N11 Codes and Other	)	CC Docket No. <u>92-105</u>
Abbreviated Dialing Arrangements	)	

**COMMENTS OF WASHINGTON STATE E911 PROGRAM**

The Washington State Enhanced 911 (E911) Program hereby submits the following brief comments in response to the Commission's Fourth Report and Order and Third Notice of Proposed Rulemaking in CC Docket No. 92-105, and Notice of Proposed Rulemaking in WT Docket No. 00-110, FCC 00-327, released August 29, 2000 ("Notice").

The Washington State E911 Program was established pursuant to Referendum 42, approved by the voters of the state in November of 1991. The program's primary emphasis is to assist the counties of Washington State to implement and operate statewide enhanced 911. The program has been successful in building partnerships that have resulted in all wireline customers now being served with enhanced 911 including 78 modern Public Safety Answering Points, field communications systems, and addressing of all roads and streets to United States Postal Service standards. The program has been actively involved with providing solutions for improved E911 location and information capabilities for Multi-Line Telephone Systems and wireless telecommunications services since 1992. Solutions to issues such as misuse of 911 for non-emergency calls and 911 system reliability assurance were implemented by counties in Washington long before they were noted in national discussions. The Washington State E911 Program works closely with the Washington Utilities and Transportation Commission (WUTC) toward a common goal of quality telecommunications service for the citizens of Washington.

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Those efforts have lead to agreements with the primary 911 service providers to upgrade all 911 selective routers in Washington State to new digital switching systems and a now underway general upgrade of the network signaling. 911 is supported in Washington State by annual collections of \$32M in dedicated 911 excise taxes and an additional contribution of \$115M from general tax revenues.

The Commission is seeking comments regarding its implementation of the Wireless Communications and Public Safety Act of 1999, which directs the FCC to designate 911 “as the universal emergency telephone number within the United States for reporting an emergency to appropriate authorities and requesting assistance.” We are fortunate in Washington to have a citizen mandate that has resulted in enhanced 911, statewide. Included in the statutes supporting the Washington State E911 Program are provisions that we look toward assisting with national standards setting to address issues dealing with assurance that E911 will continue to be a viable public safety service.

In spite of the considerable success in Washington State toward quality E911 service, two areas of concern have been frustrating. Wireless communications must be made equal partners in the deployment of E911, and Multi-Line Telephone Systems (MLTS) need capability to provide caller location to E911 systems.

Wireless customers think of their wireless handset simply as a telephone. The commission should continue efforts toward making the type of technology utilized to carry the signal a non-issue when citizens are dialing 911 for assistance.

Multi-Line Telephone Systems should all have basic E911 capabilities necessary to permit them to interface with the Public Switched Telephone Network such that the purchaser can provide an interface to the E911 system that permits the location of 911 callers to be known. The network equipment and service providers should also be required to implement cost

effective connections to permit straightforward connection of MLTS for purposes of E911 signaling.

In Washington, it was only through a cooperative process between local government, state government, utility regulators, and carriers that E911 has been made operational. Although the Commission may encourage universal 911 service, there is no authority to permit requiring local governments to implement 911. Carriers can and should be required to do their part to make 911 possible, but the Commission should make efforts to be the lead federal agency to encourage partnerships between public safety organizations, other federal organizations, and state governments to make nationwide enhanced 911 not only a reality, but a long term viable service.

Washington State has limited the use of other numbers (such as 3-1-1 and \*77) for “non-emergency” services. Those numbers will be implemented over time and the State E911 Program will play a role in assuring that the implementation is compatible with the interests of the public safety community. Nationwide, entities that implement such services should be encouraged to take steps to ensure that the public is educated regarding the distinction between emergency and non-emergency services. Implementation should also be done in a comprehensive manner to preclude 911 from becoming the default number dialed by persons who discover that one of the abbreviated dialing codes is not implemented for the system they are calling from. As these other abbreviated dialing codes are implemented they will reach a saturation point where, as 911 is today, it becomes a priority to make them universal. The Commission should anticipate that need in order to protect the 911 systems from becoming the default call when the other codes are not available.

The Commission seeks comments as to whether there are significant variations between 911 implementation for wireline and wireless carriers. One such factor in Washington has been

a conflict on how phone service is ordered from the Local Exchange Carriers (LEC) by wireless providers and the E911 services. Wireless providers have been required to purchase high capacity connections from the LEC, which were far in excess of need when low capacity facilities would be sufficient. They have also not been permitted to utilize existing capacity on facilities already in place to the 911 selective router locations. It has even been a challenge to have the LEC carrier service groups be permitted to work directly with the wireless carriers due to the LEC line of business restrictions that permit only certain features to be sold or coordinated within the subscriber versus carrier operational units. These are artificial roadblocks to implementation that the carriers often note as being in place only to satisfy Federal Communications Commission rules. The Commission should look for opportunities to streamline the ordering process for connections necessary for E911 service provisioning between carrier types.

A similar situation exists where the E911 service must cross LATA boundaries. Although LECs are permitted to provide transport for 911 service across LATA boundaries, very real restrictions exist within their order processing systems to preclude ordering of services which would be in violation of FCC rules. Carriers should be encouraged by the Commission to implement changes to order processing systems which would enhance the capability of 911 service specialists to write service orders that are comprehensive without regard to LATA or other regulatory service boundaries.

The Commission's Notice requests suggestions on how to encourage and support deployment of comprehensive end-to-end emergency communications infrastructures and programs. The comments above on permitting the streamlining of order processing by regulated carriers is one suggestion. It is also suggested that the Commission look toward other organizations and states that have demonstrated success in implementing enhanced 911 and

develop a core resource capability to assist states wishing to pursue statewide enhanced 911 programs. A great deal of expertise exists to provide assistance between states and national organizations. However, many times that resource can only be made available when there is a federal level forum for information exchange. Statewide enhanced 911 programs make sense as coordination points to encourage uniform nationwide implementation of enhanced 911 services. Many states have formed such programs and others might readily do so if the FCC would make expertise available to the legislative bodies of those states. The Commission should seek comments from the existing national organizations like the National Association of State Nine-one-one Administrators (NASNA), National Emergency Number Association (NENA), Association of Public-safety Communications Officials (APCO) and others on how to implement a resource sharing group to assist states wishing to implement statewide E911 programs.

Finally, while the Commission defers discussion of customer proprietary network information and subscriber list issues, we take this opportunity to stress the critical importance of those issues. Wireless carriers have been unwilling to put in place reliable rapid processes for acquiring that information when it is needed for dispatch of emergency assistance.

The Washington State Enhanced 911 Program urges the Commission to move forward in all aspects of its implementation of the Wireless Communications and Public Safety Act of 1999 and makes its staff available as practicable to assist in making Enhanced 911 nationwide.

Respectfully submitted,

Robert G. Oenning